UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER : 21 MC 100 (AKH)

SITE LITIGATION : (All Cases)

IN RE COMBINED WORLD TRADE CENTER : 21 MC 103 (AKH)

AND LOWER MANHATTAN DISASTER SITE : (All Cases)

LITIGATION (straddler plaintiffs) :

NOTICE OF MOTION TO DISMISS CLAIMS AGAINST THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY

PLEASE TAKE NOTICE that on a day to be determined by this Court, Plaintiffs' Co-Liaison Counsel, Worby Groner Edelman & Napoli Bern, LLP, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pearl Street, New York, New York, Room 14-D for Order seeking the dismissal of certain plaintiffs' claims against defendant The Port Authority of New York and New Jersey with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(2).

Dated: New York, New York October 4, 2011

/s/ Christopher R. LoPalo

Christopher R. LoPalo Worby Groner Edelman & Napoli Bern, LLP 350 Fifth Avenue, Suite 7413 New York, New York 10118 (212) 267-3700 Attorneys for Plaintiffs